



UAS Systems Manufacturer

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U.S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Petition seeking relief under Section 44807 of the FAA Reauthorization Act of 2018

Dear Sir or Madam:

Hylío Inc. would like to make an AMMENDMENT to a previous petition filed June 22, 2020 requesting to conduct Commercial Agricultural Services using the Hylío AG-122 (Exemption 18802).



Amendment

Amendment Part 1

Pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, Hylío Inc. recently received an approved Exemption to allow commercial operation of the Hylío AG-116 (Exemption 18807) and the Hylío AG-122 (Exemption 18802), both weighing 55 lbs. or more. In an effort towards convenience and reduction of paperwork for both Hylío Inc. and the FAA, Hylío Inc. would like to effectively combine these two exemptions. Exemption 18807 and Exemption 18802 are similar in all approvals, conditions, and limitations aside from the aircraft model (both of which are over 55lbs and utilize almost identical operating systems). To effectively combine the two exemptions, Hylío requests to amend exemption 18802 to include the Hylío AG-116 aircraft approved under exemption 18807.

Amendment Part 2

Hylío seeks an amendment of Exemption No. 18802, seeking relief from the conditions and limitations of number 27c.

Number 27c states:

27. All flight operations must be conducted at least 500 feet from all persons who are not directly participating in the operation, and from vessels, vehicles, and structures, unless when operating:

c. Near vessels vehicles and structures. Prior to conducting operations, the operator must obtain permission from a person with the legal authority over any vessels, vehicles or structures that will be within 500 feet of the UA during operations. The PIC must make a safety assessment of the risk of operating closer to those objects and determine that it does not present an undue hazard.

Hylío Inc. Requests that the FAA not request public comment on its petition because it would not set any precedent and because the relief requested is identical to the already approved petition by Integrated Ag Services, Inc. Exemption No. 18320, granted previously by the FAA. 14 C.F.R. § 11.87. In addition, Hylío Inc. will be utilizing the same proven technologies and mitigations the FAA has already accepted and approved in that exemption.



The previously granted conditions and limitations are as follows:

27. All flight operations must be conducted at least 500 feet from all persons who are not directly participating in the operation, and from vessels, vehicles, and structures, unless when operating:

c. Closer than 500 feet from vessels, vehicles and structures. The UA may be operated closer than 500 feet, but not less than 100 feet, from vessels, vehicles, and structures under the following conditions:

- (1) The UAS is equipped with an active geo-fence boundary, set no closer than 100 feet from applicable waterways, roadways, or structures;*
- (2) The PIC must have a minimum of 7 hours experience operating the specific make and model UAS authorized under this exemption, at least 3 hours of which must be acquired within the preceding 12 calendar months;*
- (3) The PIC must have a minimum of 25 hours experience as a PIC in dispensing agricultural materials or chemicals from a UA;*
- (4) The UA may not be operated at a groundspeed exceeding 15 miles per hour;*
- (5) The UA altitude may not exceed 20 feet AGL; and*
- (6) The PIC must make a safety assessment of the risk of operating closer than 500 feet from those objects and determine that it does not present an undue hazard.*

Hylio Inc. intends to follow these conditions and limitations as well as other internal protocols. The enclosed proprietary ConOps and Risk Assessment Manuals outline these protocols and should provide the support necessary to grant the amendment. A section can be found in each of these documents with specific reference to the under 500ft limitation.

(Hylio AgroDrone CONOPS Manual Page 10)

(Hylio AgroDrone Risk Assessment Manual Page 12)

Sincerely,

Nick Nawratil
COO & Chief Pilot, Hylio Inc.